

## Federal Communications Commission Enforcement Bureau 45 L Street, NE Washington, DC 20554

February 10, 2022

## VIA ELECTRONIC DELIVERY AND CERTIFIED MAIL - RETURN RECEIPT REQUESTED

To: Mikel Quinn
Chief Executive Officer
Great Choice Telecom LLC
9597 Jones Rd. Suite 110
Houston, TX 77065
mikel@greatchoicetelecom.com

Re: Official Correspondence from the Federal Communications Commission

Dear Mr. Quinn:

We have determined that Great Choice Telecom LLC, (Great Choice Telecom) is apparently transmitting illegal robocall traffic on behalf of one or more of its clients. You should investigate and, if necessary, cease transmitting such traffic immediately and take steps to prevent your network from continuing to be a source of apparently illegal robocalls. As noted below, downstream voice service providers will be authorized to **block** *all* of Great Choice Telecom's traffic if you do not take steps to "effectively mitigate illegal traffic" within 48 hours, or if you fail to inform the Commission and the Traceback Consortium within fourteen (14) days of this letter (Thursday 24, 2022) of the steps you have taken to "implement effective measures" to prevent customers from using your network to make illegal calls.<sup>1</sup>

Why You Are Receiving This Notification. You are receiving this letter because one or more investigations conducted by the Commission, in conjunction with the Traceback Consortium, revealed that Great Choice Telecom apparently transmitted multiple illegal robocall campaigns from the sources listed in Attachment A.

Actions You Should Take Now. Great Choice Telecom should take the following steps to resolve this matter:

- 1. Promptly investigate the transmissions identified in Attachment A.
- 2. If necessary, "effectively mitigate" the identified unlawful traffic by determining the source of the traffic and preventing that source from continuing to originate such traffic.
- 3. Implement effective safeguards to prevent customers from using your network as a platform to originate illegal calls.
- 4. Within 48 hours, inform the Commission and the Traceback Consortium of steps taken to mitigate the identified apparent illegal traffic.
- 5. Within fourteen (14) days of the date of this letter (Thursday, February 24, 2022) inform the Commission and the Traceback Consortium of the steps Great Choice Telecom is

.

<sup>&</sup>lt;sup>1</sup> See 47 CFR § 64.1200(k)(4).

taking to prevent customers from using its network to transmit illegal robocalls.<sup>2</sup> You must also include a declaration attesting to the truthfulness and accuracy of your response under section 1.17 of the Commission's rules.<sup>3</sup> Failure to provide this information within 14 days shall be equivalent to having failed to put effective measures in place.<sup>4</sup>

Consequences for Failure to Comply. If after 48 hours of issuance of this letter Great Choice Telecom continues to route or transmit harmful robocall traffic from the entities involved in these campaigns, downstream U.S.-based voice service providers may begin blocking all calls from Great Choice Telecom after notifying the Commission of their decision and providing a brief summary of their basis for making such a determination. Furthermore, if Great Choice Telecom fails to take sufficient mitigating actions to prevent its network from continuing to be used to transmit illegal robocalls, then downstream U.S.-based providers may block calls following notice to the Commission. Failure to act within the deadlines authorizes U.S.-based voice service providers to block *all* call traffic transmitting from your network, permanently.

Please direct any inquiries or responses regarding this letter to Daniel Stepanicich, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, FCC, at Daniel.stepanicich@fcc.gov or (202) 418-7451; and cc: to Kristi Thompson, Division Chief,

٠

<sup>&</sup>lt;sup>2</sup> See Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket No. 17-59, Third Report and Order, Order on Reconsideration, and Fourth Further Notice of Proposed Rulemaking, 35 FCC Rcd 7614, 7630, para. 43 (2020) (Call Blocking Safe Harbor Report and Order).

<sup>&</sup>lt;sup>3</sup> 47 CFR § 1.17. See also 47 CFR § 1.16 (describing the format of such declarations).

<sup>&</sup>lt;sup>4</sup> You are encouraged to reach out to the Commission before the deadline if you anticipate needing more time to execute this step.

<sup>&</sup>lt;sup>5</sup> In July 2020, the Commission adopted the Call Blocking Safe Harbor Report and Order, which authorized voice service providers to block illegal robocalls. Call Blocking Safe Habor Report and Order, 35 FCC Rcd 7614; see also 47 CFR § 64.1200(k)(3)-(4). If the Commission identifies illegal traffic, based on information obtained through traceback such as that provided by the Traceback Consortium, the Commission may notify the voice service provider that it is transmitting identified probable illegal calls (or "bad traffic") and, upon receipt of notification, the voice service provider should investigate promptly and take any steps that may be necessary to prevent the illegal caller from continuing to use the network to make such calls. Furthermore, if the notified voice service provider fails to take effective mitigation measures within 48 hours, any downstream voice service provider may block the calls from the notified provider. Call Blocking Safe Harbor Report and Order, 35 FCC Rcd at 7628-29, para. 39. Any voice service provider that decides to block traffic from the bad actor provider must notify the Commission of its decision and provide a brief summary of its basis for making such a determination prior to initiating blocking. *Id.* at 7630, para. 42; 47 CFR § 64.1200(k)(4). If the notified voice service provider fails to implement effective measures to prevent new and renewing customers from using its network to originate illegal calls, other downstream voice service providers may block the calls from the notified provider. Call Blocking Safe Harbor Report and Order, 35 FCC Rcd at 7630 para. 43; 47 CFR § 64.1200(k)(3)-(4). A voice service provider that decides to block traffic from the bad actor provider must notify the Commission of its decision and provide a brief summary of its basis for making such a determination prior to initiating blocking. Id. at 7630, para. 43; 47 CFR § 64.1200(k)(4).

Telecommunications Consumers Division, Enforcement Bureau, FCC, at <a href="mailto:kristi.thompson@fcc.gov">kristi.thompson@fcc.gov</a> .	A
copy of this letter has been sent to the Traceback Consortium.	

Sincerely,

Loyaan A. Egal Acting Bureau Chief Enforcement Bureau Federal Communications Commission

## ATTACHMENT A

Customer	Date of Call	Date of ITG Notification	Caller ID	Called Number	Description	Violation
Clevertel	Oct. 26, 2021	Oct. 27, 2021			Legal-	47 USC
	18:15 ÚTC	13:39 ÚTC			Consequences	227(b); 47
					1	CFR
						64.1200(a)
Clevertel	Oct. 26, 2021	Oct. 27, 2021			Legal-	47 USC
	15:28 ÚTC	17:49 ÚTC			Consequences	227(b); 47
					1	CFR
						64.1200(a)
Xtream VoIP	Oct. 28, 2021	Oct. 29, 2021			SSA-P1-	47 USC
	18:07 UTC	20:16 UTC			TexasFraud	227(b); 47
					(GovtImpers)	CFR
					1 /	64.1200(a)
Xtream VoIP	Oct. 28, 2021	Oct. 29, 2021			SSA-P1-	47 USC
	15:28 UTC	20:22 UTC			TexasFraud	227(b); 47
					(GovtImpers)	CFR
						64.1200(a)
Xtream VoIP	Oct. 28, 2021	Oct. 29, 2021			SSA-P1-	47 USC
	15:02 UTC	20:28 UTC			TexasFraud	227(b); 47
					(GovtImpers)	CFR
						64.1200(a)
Xtream VoIP	Nov. 13, 2021	Nov. 15, 2021			Utility-	47 USC
	13:03 UTC	13:49 UTC			30MinDisconnect	227(b); 47
						CFR
						64.1200(a)
Xtream VoIP	Nov. 15, 2021	Nov. 16, 2021			SSA-P1-	47 USC
	17:13 UTC	22:01 UTC			TexasFraud	227(b); 47
					(GovtImpers)	CFR
					<u> </u>	64.1200(a)
Xtream VoIP	Nov. 22, 2021	Nov. 29, 2021			SSA-P1-	47 USC
	15:21 UTC	15:22 UTC			TexasFraud	227(b); 47
					(GovtImpers)	

				CFR 64.1200(a)
Xtream VoIP	Nov. 22, 2021 21:25 UTC	Nov. 23, 2021 13:45 UTC	SSA-P1- TexasFraud (GovtImpers)	47 USC 227(b); 47 CFR 64.1200(a)
Xtream VoIP	Nov. 22, 2021 14:31 UTC	Nov. 23, 2021 16:04 UTC	SSA-P1- TexasFraud (GovtImpers)	47 USC 227(b); 47 CFR 64.1200(a)
Xtream VoIP	Nov. 19, 2021 16:23 UTC	Nov. 23, 2021 16:05 UTC	SSA-P1- TexasFraud (GovtImpers)	47 USC 227(b); 47 CFR 64.1200(a)
Xtream VoIP	Nov. 22, 2021 20:30 UTC	Nov. 23, 2021 15:37 UTC	SSA-P1- TexasFraud (GovtImpers)	47 USC 227(b); 47 CFR 64.1200(a)
Xtream VoIP	Nov. 23, 2021 15:58 UTC	Nov. 23, 2021 16:40 UTC	SSA-P1- TexasFraud (GovtImpers)	47 USC 227(b); 47 CFR 64.1200(a)
Xtream VoIP	Nov. 29, 2021 22:10 UTC	Dec. 2, 2021 17:55 UTC	SSA-P1- TexasFraud (GovtImpers)	47 USC 227(b); 47 CFR 64.1200(a)
Xtream VoIP	Nov. 29, 2021 21:06 UTC	Nov. 30, 2021 16:01 UTC	SSA-P1- TexasFraud (GovtImpers)	47 USC 227(b); 47 CFR 64.1200(a)
Xtream VoIP	Nov. 29, 2021 17:44 UTC	Nov. 30, 2021 16:03 UTC	SSA-P1- TexasFraud (GovtImpers)	47 USC 227(b); 47 CFR 64.1200(a)

Xtream VoIP	Nov. 29, 2021	Nov. 30, 2021		SSA-P1-	47 USC
	17:39 UTC	16:05 UTC		TexasFraud	227(b); 47
				(GovtImpers)	CFR
					64.1200(a)
Xtream VoIP	Nov. 29, 2021	Nov. 30, 2021		SSA-P1-	47 USC
	15:49 UTC	16:09 UTC		TexasFraud	227(b); 47
				(GovtImpers)	CFR
					64.1200(a)
Easyway	Dec. 7, 2021	Dec. 9, 2021		LegalNotice-	47 USC
Communications	15:17 UTC	18:18 UTC		Identity	227(b); 47
					CFR
					64.1200(a)
Easyway	Dec. 7, 2021	Dec. 9, 2021		LegalNotice-	47 USC
Communications	16:28 UTC	18:18 UTC		Identity	227(b); 47
					CFR
					64.1200(a)